

Response to Public Comments on Draft EA/Hunt Plan for RRL NWR

Comment 1: “We are *not* anti-hunters. But we think “management” also means that we, hunters and non-hunters alike, are careful in selecting those areas where the right to hunt is overridden by the right to preserve”.

Response: We were careful in selecting hunting areas on the Refuge. Hunting was an issue that received many public comments to the Refuge’s Comprehensive Conservation Plan and this Hunt Plan/EA. We modified the action for hunting on the Refuge based on those comments.

Comment 2: In the “Environmental Consequences”, there is no discussion about potential impacts on Trumpeter Swans”.

Response: Significant revisions were made to address trumpeter swan concerns in this Environmental Assessment/Hunt Plan.

Comment 3: In the section analyzing potential impacts to “Other Non-game Wildlife” there is discussion of a myriad of species, from amphibians to voles, even spiders, but absolutely no analysis of impacts on Trumpeter Swans.

Response: A Cumulative Impact statement was added to the document for Trumpeter Swans.

Comment 4: In the “Affected Environment” section, there is no mention of Trumpeter Swans.

Response: A statement was added describing the importance of Red Rock Lakes NWR to the overall productivity of trumpeter swans in the Greater Yellowstone Ecosystem.

Comment 5: “The most glaring omission in the Environmental Assessment is any reference to the Refuge Comprehensive Conservation Plan.

Response: In the draft hunt plan, little background information was provided on the Laws, Mission and guiding principles of the National Wildlife Refuge System. That is because the hunt plan and Environmental Assessment is a “step down” plan guided by the Comprehensive Conservation Plan completed by the Red Rock Lakes NWR in 2009. Important background information was in that document and may be accessed by visiting the Refuge web site, where a copy of the CCP or chapters are available for download.

Comment 6: “Under the Purpose and Need section, more clearly describe why, for example, it is necessary to open new areas for mountain grouse hunting, expand the waterfowl hunting area, and deal with a law enforcement problem of road hunting.

Response: “Based on public input we’ve withdrawn the proposal to hunt “mountain grouse” in the final plan/EA. The waterfowl hunting area will be expanded slightly to address public requests for an opportunity for “walk-in” waterfowl hunting. This will be a safe and viable alternative to boat hunting on Lower Red Rock Lake during windy days. We believe this small expansion provides a new and different opportunity for the public to enjoy a compatible form of wildlife-dependent recreation. The road hunting issue is first addressed in the need for action section of the EA. This issue was also discussed in the CCP published in 2009.

Comment 7: “The perceived elk harboring problem needs clear description”.

Response: We’ve clarified the perceived elk harboring problem by stating our intent was to minimize brucellosis concerns by redistributing elk over the landscape, and to provide quality limited hunting opportunities for the public.

Comment 8: “What and where are the road hunting problems associated with this elk concentration?”

Response: Hunting on National Wildlife Refuges is a privilege, not a right. Illegal shooting of elk from the road has occurred west of the Refuge in recent years. In years of early season heavy snow, elk move close to the road, increasing the chances of shooting from a vehicle or road ditch. We want to ensure the highest quality hunting experience while on the refuge, with fair chase and ethical standards being the highest priority. That is why we will prohibit shooting/hunting along South Valley Road until at least 50 yards from the centerline of the road in an area where hunting is open.

Comment 9: “What is the basis for unfounded statement on page 15 regarding concern about elk overpopulation and habitat degradation?”

Response – The statement regarding habitat degradation by elk was removed. However, several studies conducted within the Greater Yellowstone Ecosystem have suggested that overbrowsing by large ungulates on aspen and willow habitats have reduced the abundance and diversity of migratory land birds (Baril et al. 2011). So, it is conceivable that if elk, found in high densities, browse on small tracts of habitat on the refuge for prolonged periods of time, they will negatively impact habitat quality and reduce migratory land bird abundance and diversity.

Comment 10: “The cumulative impacts section should include all special status species – endangered, threatened, candidate and listed Montana species of concern – not just Grizzly bears.

Response: We mention species that are known to occur on the Refuge. NEPA has generally been limited to selected game species, federally or state listed threatened and endangered species. The only federally or state listed threatened and endangered species that occurs on the Refuge is the Grizzly Bear.

Comment 11: “Hunting season should not start before November 1 to guarantee the security of the visitors of the Environmental Humanities Education Center.”

Response: We disagree that any of the refuge hunting programs pose a safety or security risk to any visitors to the Refuge or to the adjacent Environmental Humanities Education Center. There is no evidence the visitor “security” is compromised in any way by the refuge hunting program. However, we do understand that different refuge user groups have different desires and expectations regarding their visitor experience. Spatial and temporal zoning are techniques commonly used within the refuge system to minimize potential for conflicts between user groups. The following text was added to the EA: “Hunting for big game in the Limited Big Game Hunting area would start on November 1 for the first three years. After this time, the start date may be adjusted earlier if few conflicts were identified between hunters and non-hunting visitors during the first 3 years. The start date would never be earlier than the opening day of General Big Game season or from October 20-27”.

Comment 12: “This proposal from the US Fish and Wildlife Service will have a negative impact on the Environmental Humanities Education Center ability to provide environmental educational programming in the fall months”.

Response: We believe this assertion is highly speculative and is not supported by any facts. We disagree with the notion that environmental education activities cannot successfully occur next or near to an area that is open to public hunting. Hunting has been a long-standing tradition at Red Rock Lakes NWR, the Centennial Valley and throughout the West, it should be expected that hunting will occur on publicly owned lands. Hunting is also a priority public use for the National Wildlife Refuge System. Additionally, local economies are also dependent upon hunting from both resident and non-resident hunters. Modifications were made to the limited big game hunt area at the request of University of Utah College of Humanities, to postpone the opening date until November 1st for the first three years. This date is when the University anticipates ending classes for the fall. We have also initiated a 50-yard buffer to the Sparrow Pond Trail that will allow space separation for the non-consumptive users, the University and other waterfowl hunters downstream of the Sparrow Pond Trail Bridge. We will monitor impacts of both consumptive and non-consumptive uses annually to determine if conflicts occur. If conflicts arise, we will adjust the areas and time periods when various forms of public use are permitted to resolve conflicts between different user groups.

Comment 13: “When the expanded hunting proposal was conceived, the Environmental Humanities Education Center and its yearly activities on the Refuge from July to November had not been envisioned and were not taken into consideration. Because it has not been addressed, there are critical issues of visitor safety and educational experience unresolved.”

Response: We modified the EA to address hunting impacts concerns raised by the Environmental Humanities Education Center. Hunting is a long-time historic public use at Red Rock Lakes

NWR and pre-dates by decades. We disagree that the proposed hunt plan changes in any way create a “critical issue of visitor safety”. We have added text to the EA that considers hunting impacts to the Environmental Humanities Education Center. For example, mountain grouse hunting was dropped due to the potential for conflict between grouse hunters and EHEC students/faculty.

The CCP was modified to recognize the new center prior to final publication in 2009. In the draft CCP produced in fall of 2008, the preferred alternative for Environmental Ed was:

Page 53: “Due to the refuge’s remote location, environmental education would continue to be opportunistic as time and staff allows. Student groups would continue to not visit the refuge due to road conditions and distance. No current staff would be dedicated to environmental education. There would continue to be no refuge-specific programs or events for students or adults.

However, due to renovation of buildings in Lakeview and emerging plans for development of an environmental center by the owner, the refuge chose a different alternative for environmental education in the final CCP published June 2009. Page 90 of the final CCP: “The Environmental Education Objective: Work with partners to provide annual on-site environmental educational programs for up to five organized groups and 300 visitors and students of all abilities to foster an environmental ethic, and an understanding and appreciation of the issues and programs of the refuge and the value of the natural resources of the Centennial Valley.

Comment 14: “Enormous financial and staff resources have been invested in creating a dynamic EHEC education program that also helps the Refuge fulfill its mission of environmental education. We want to expand and strengthen Refuge/EHEC collaboration not weaken it.”

Response: The mission of the refuge is not environmental education, but both hunting and environmental education are co-equal priority public uses of the refuge that we support and encourage. We also seek to strengthen partnerships to support both forms of wildlife-dependent recreation. Other local businesses and outfitters have also contributed financial and personal resources for their businesses that depend on revenue generated from hunters for sustaining their economic livelihood. Except for the last week in October, expanded waterfowl hunting is the only possibility that may conflict with University activities. A 50-yard buffer was added downstream of Sparrow Pond Trail Bridge that should minimize conflicts between hunters and University affiliates.

Comment 15: “Hunting has existed on the Refuge for decades. That is not the current problem. The issue is that the proposed hunting change will leave only 7,306 closed to hunting as opposed to the 23,574 acres currently protected. This is a drastic expansion and it negatively impacts popular accessible areas for wildlife viewing and hiking including the Sparrow Pond Trail and

the grasslands directly to the east of the Center. It calls into question safety issues in our camping areas above the Center.”

Response: We decided not to open grouse hunting. It was not opened because this type of hunting occurs in the timbered areas around Lakeview and occurs in September when there are significant other public users in the same general areas of the refuge. This will eliminate the potential for conflict between environmental education publics and hunting. Other September hunters (big game bow hunters) will still be using the refuge timber as they have in the past. No conflicts have been identified in the past between this primitive weapon hunt and non-hunters. Hiking can still occur on all areas that are open to hunting. Refuge users should expect to occasionally encounter hunters. Essentially all public lands are open to hunting throughout the West, so it should be expected there will be hunters present during September, October, and November.

Comment 16: “The mandated mission of the Refuge to form partnerships for education also is jeopardized by this proposal. In addition, we have serious reservations that the Refuge has the staff to monitor the increased hunting territory and to ensure the safety of individuals caught in a conflicting use scenario”.

Response: The Refuge does not have a “mandated mission” to form partnerships for education. The mission of the NWRs is in law, and is stated in the hunt plan/EA. Environmental education, hunting, fishing, interpretation, wildlife observation and wildlife photography are all co-equal priority public uses of the refuge system and we welcome partnership with others to encourage all of those uses whenever they are compatible with the purposes of the refuge and mission of the refuge system. We disagree that changes to the hunt plan result in an unsafe situation.

The refuge has developed effective partnerships with local MFWP game wardens, BLM, USFS, and with FWS law enforcement staff elsewhere in Montana. We believe there is adequate staff to monitor the additional lands being opened to hunting. Improved boundaries that are more easily understood are part of the changes that will help law enforcement staff. The 50-yard from road center line hunting prohibition will also help.

Comment 17: ““Refuge” is a word that implies safety, security and rest and so how does hunting and killing animals on a “refuge” make sense?”

Response: Congress has determined and directed that six forms of wildlife-dependent recreation: hunting, fishing, wildlife observation, photography, interpretation, and environmental education, when compatible, are legitimate and appropriate uses of the Refuge System. Please see National Wildlife Refuge Improvement Act of 1997

The literal translation of the word REFUGE is correct. However, by law, the U.S. Fish and Wildlife Service is encouraged to provide public hunting opportunities for the general public, if compatible with refuge purpose and mission. Significant portions of Red Rock Lakes NWR were purchased with hunter-generated dollars. People who hunt waterfowl, by law, purchase a

federal duck stamp. This money generated by hunters is used for land acquisition. Please see the Migratory Bird Hunting and Conservation Stamp Act 1934. (Commonly known as the “Duck Stamp Act”) A significant tax on sales of firearms and ammunition also pays for wildlife conservation projects. Please see The Pitman-Robertson Federal Aid in Wildlife Restoration Act 1937. Hunters continue to play a crucial role in preserving wildlife and their habitat for all Americans.

Comment 18: “The irony of teaching spirituality within earshot of hunters shooting wildlife is surely not lost on you. ...The safety of adults, college and high school students who will visit the Refuge as a place of learning will be severely compromised. It seems obvious there’s a lot of room for negotiation”.

Response: For the Refuge’s environmental educational goals and objectives, please see pages 90-91 in the Refuge’s CCP. People experience spirituality in many ways. It has been noted that hunting is a form of spirituality. Additionally, the surrounding public lands are open to hunting so it should be expected that shooting, albeit target practice or at hunted game species, is a way for people to connect to the natural world. For the majority of the year, there is no hunting on the refuge so abundant opportunities exist for exploring the natural world without hunting activities. One should expect that hunters (and other groups) find spirituality during the fall on refuge and adjacent public lands (BLM, DNRC, USDA & USFS). As a way of reducing gunshots, in the outdoors during September, we have dropped grouse hunting and delayed the start of Limited Big Game hunting until after classes end on November 1st. Limiting big game hunters is also meant to minimize conflicts among users.

Comment 19: “Students, teachers, business people and all other visitors will have to consider hunting and its impact on all outdoor activities. This seems unsafe, ineffective, and unnecessary. This is an unacceptable adjustment”.

Response: We disagree. Hunting has been a part of human tradition for thousands of years and is an essential part of the North American Model for management of wildlife resources in the United States. Students. So, students, teachers, business people, and all other visitors should expect that hunting is a part of the Western landscape and enjoyment for the American people. Understanding hunting in a natural landscape is important to students and the public. We believe students benefit from a broad perspective on issues.

Comment 20: “These changes will affect visitor’s access to ponds and streams. This threatens the Environmental Center’s promise to visitors and its very meaning and intent.

Response: We disagree with this highly speculative assertion.

The Refuge will not manage for only one public user group or constituency. Hunting is a compatible activity within the National Wildlife Refuge System. There are still several waterways closed to hunting year round, including: parts of the River Marsh, ponds in-between Upper and

Lower Red Rock Lake, Swan Lake, Culver and Widgeon Pond, Red Rock and Elk Springs Creek, and upper Odell Creek.

Comment 21: I am one who loves “The National Wildlife Refuge System and now despises how they have been strangled by the NRA and turned into something that does not even slightly resemble its founding concept or what the public’s impression of them is”.

Response: The founding concept of the National Wildlife Refuge System was to preserve American natural heritage, of which hunting is a natural heritage.

A segment of the public thinks we should open all of the Refuge to unlimited hunting. The 1997 Refuge Improvement Act was a great compromise between two different visions for the National Wildlife Refuge System. It established six priority public uses as appropriate and should be encouraged on NWRs. Final vote on that Act was one of the most bipartisan accomplishments in the history of the USA. The house voted 491-1 and the Senate voted 99-0 to approve. President Clinton signed.

Comment 22: “You also have a responsibility to provide quality non-consumptive experiences while not destroying opportunities for other users”.

Response: Quality non-consumptive opportunities exist year-round, including hunting season. Greater than 5 million acres of public land surround the Centennial Valley and provide essentially unlimited opportunity for non-consumptive users to experience remote and relatively pristine locations. More than 7,000 acres of Refuge lands will remain closed to hunting year round so people can experience great places where no hunting will occur. Non-consumptive users of the refuge can consult the refuge manager for ideas of how to avoid conflict with hunters. Many refuges in America provide opportunities for hunting and other uses such as wildlife observation without significant conflicts and without compromising safety.

Comment 23: “The expansion of hunting means that we will have to seriously consider whether we can go forward with our programs, or at the very least have to drastically curtail them, as well not be able to guarantee the safety of our students and guests in the fall months.”

Response: Other entities are always free to reconsider their business plans. We disagree with the notion that hunting and education activities are mutually exclusive uses that cannot occur on the same landscape. Many National Wildlife Refuges provide hunting and other “non-consumptive” uses at the same time without experiencing any safety issues. Temporal and spatial zoning allow many wildlife dependent recreational uses to occur on the same refuge. Hunting has been part of the local landscape for thousands of years and for nearly 77 years at the refuge. It is an opportunity for students to understand the multiple land uses of the local area. Millions of acres, which surround Lakeview and the Refuge, are currently open to hunting. Within this hunt plan, grouse hunting was dropped and the limited big game hunt area won’t open until 1 November for at least 2012, 13, and 14.

Comment 24: “The word “refuge” means a shelter from danger, yet the proposal will reduce the protected area inside the refuge by over two thirds, from 23,574 acres to only 7,306 acres. The Red Rock Lakes area will no longer be a refuge. It will become a hunting ground.”

Response: Hunting is an appropriate and legal activity on National Wildlife Refuges. See also comment and response 21.

Comment 25: “In the assessment, it is expressed that the considerations of “fishing, wildlife observation, wildlife photography, environmental education and interpretation” also be taken into account. If this is true, I hope to see how the environmental assessment addresses the needs and goals of these other wildlife dependent activities”.

Response: This is an Environmental Assessment for hunting on Red Rock Lakes National Wildlife Refuge. Please refer to the Refuge’s Comprehensive Conservation Plan (2009) to see how the Refuge addresses the needs and goals of other wildlife dependent activities. The CCP is available on the Refuge home page.

Comment 26: “Alternative B should be amended to include both Sparrow Pond and Sparrow Slough areas” into the waterfowl expansion area.

Response: Red Rock Lakes National Wildlife Refuge is the most important breeding grounds for trumpeter swans in Idaho, Wyoming and Montana. Swan hunting is prohibited and snow geese rarely use this part of Montana. Thus, hunters have not shot swans by accident since the refuge was established in 1935. In the fall, adult swans can avoid indirect impacts from hunting pressure by flying to areas closed to hunting. However, flightless cygnets may be more vulnerable to indirect impacts from hunting because they cannot readily fly away from disturbance but must swim. At times, flightless cygnets are present when waterfowl hunting opens in early-October. Over the past 20 years there have been from zero-39 cygnets fledged per year in the Centennial Valley. The number of flightless cygnets on the refuge during the opening weekend of waterfowl season depends on the number hatched and reared on the refuge. Number of flightless cygnets also depends on when the adults initiated their nests the prior spring. For example, trumpeter swan incubation takes approximately 35 days and fledging takes approximately 100 days. Thus, it can take 135 days from the time incubation starts until a cygnet can fly. If an adult pair of swans initiates incubation on 1 May, cygnets won’t be able to fly until approximately 15 September. Alternatively, if an adult pair initiates incubation on 20 May, cygnets will not fly until after the opener of waterfowl hunting season. Refuge lakes are usually still frozen on May 1.

Due to the expansive and continuous wetland habitat surrounding Lower Lake, flightless cygnets are able to avoid hunting pressure by swimming away and finding security from hunters. Furthermore, due to the wilderness designation of Lower Lake, motorized boat use is prohibited. Cygnets are capable of swimming away from boats. Flightless cygnets are more susceptible to hunting related pressure in landlocked wetlands such as Sparrow Pond and Sparrow Slough.

These enclosed wetlands are surrounded by upland habitat, are small in area, and are susceptible to reduced water levels or even drying out during drought years. On these enclosed ponds, flightless cygnets may not be able to escape hunting pressure, making them more susceptible to negative effects of hunting related disturbance than flightless cygnets on Lower Lake. Negative effects include reduced body condition, reduced foraging efficiency, and stress which all could individually or synergistically reduce cygnet survival or delay fledging. Sparrow Pond and Sparrow slough are isolated habitats where trumpeter swan cygnets may be present, without sufficient escape cover during waterfowl season. Thus we will not open hunting on Sparrow Pond and Sparrow Slough.

Comment 27: “The span of O’Dell Creek immediately north of the South Valley Road should be opened for waterfowl hunting”.

Response: The safety closure area around Lakeview and Refuge HQ and the safety closure area on portions of Odell trail will remain to protect nearby residences. No waterfowl hunting will be allowed on Odell Creek until 50 yards downstream of the Sparrow Pond Trail Bridge.

Comment 28: “I am concerned that the opposition from the University of Utah Environmental Humanities Center is really based on opposition to hunting on the refuge rather than any legitimate or actual concerns they have over imagined conflicts with Environmental Education or other users”.

Response: We believe people are entitled to their opinions, even if they may be masking anti-hunting sentiment through the lens of perceived safety concern. This plan strikes the correct balance between consumptive and non-consumptive users by including access for hunters, and space and time separation for non-hunters. The University of Utah reserves the right to oppose any part of this plan for whatever reason they deem necessary or appropriate. As managers, we do our best to balance the needs of all constituents.

Comment 29: “Centennial Valley is a very special place, and expanding hunting in the valley would serve no one except hunters”.

Response: We respectively disagree with this statement. The refuge goal is to offer all “Big” six wildlife dependent public user groups a quality wildlife dependent experience. We want all users to love their experience and love the resources of the Centennial Valley. We would argue that both hunting and the Environmental Education Center provides benefit for many Americans and to residents of the Centennial Valley and to the local economy.

Comment 30: “Does the Refuge anticipate allowing two people to put in a single application? For example, if I wanted to hunt with one of my sons, could we put in a single application to hunt together?”.

Response: We will have some method to allow a party to occupy the two slots. However, two people submitting a single application may impact your percentage chance in the drawing.

Comment 31: “Do you anticipate applicants will be able to put in for specific dates” to hunt.

Response: Hunters can request specific dates.

Comment 32: “By opening up the Refuge for expanded waterfowl and big game hunting, we (Environmental Humanities Education Center) would not be able to safely consider taking our students into this area”.... (waterfowl hunt area)

Response: We have effectively opened just 715 acres of additional lands for waterfowl hunting, of which limited suitable duck hunting is available on 35 acres of open water and Odell Creek. We do not consider this a dramatic increase in acres open to waterfowl hunting. For big game hunting, we have limited the number of hunters to 2 per day near the Center, and big game hunting in that area will be delayed to November 1 for the first 3 years. We will monitor conflicts between users. See map in hunt plan.

Comment 33: “My fundamental problem with the proposed hunting expansion is that it comes in conflict with general goals of wildlife conservation in the Centennial Valley and the efforts by many to increase concern for fragile environments and resident or migratory wildlife populations on the refuge”.

Response: Hunting is a principle part of the North American Model of Wildlife Management. Hunting was determined to be a compatible use of the refuge in the 2009 Comprehensive Conservation Plan (Page 141). Additionally, hunting is an acceptable form of recreation within designated Wilderness. Moreover, many migratory wildlife populations have departed their breeding grounds of the Centennial Valley by the time hunting starts in the fall. Finally, hunting stamps and taxes have provided additional funding for land acquisition additions to the refuge.

Comment 34: “Will livestock be allowed to retrieve game?” .

Response: Pack stock (horses/lamas) is allowed south of South Valley Road to assess lands managed by other agencies. Pack stock will be prohibited while hunting north of the South Valley Road but will be allowed for game retrieval.

Comment 35: “I am writing to ask that you allow more walk in access for public hunting”.

Response: We have expanded waterfowl hunting for walk in hunters. This provides a unique form of hunting, jump shooting, that is currently limited on the Refuge. Nearly all big game hunting is walk in because much of the area is designated wilderness.

Comment 36: “Hunting dollars support such refuges and I believe more access will equate to more funding as more of the public is able to utilize the resource. With development and

degradation of hunting access throughout the West I believe it is extremely important to maintain more public access to our public grounds for hunting and fishing”.

Response: Significant portions of the Refuge were acquired with dollars raised from sales of the Federal Duck Stamp but not all. Annual operating budgets for refuges come from funds appropriated by congress. It is well recognized that hunting has given many people a deeper appreciation of wildlife and better understanding of the importance of conserving their habitat, which has ultimately contributed to the Refuge System Mission.

Comment 37: “We would also ask the Refuge to look at maintaining higher lake levels”.

Response: This Environmental Assessment pertains to hunting on the Refuge. Water level management was discussed in the Refuge’s Comprehensive Conservation Plan. Text on water level management can be found on pages 73-74 of that document. Access points to Lower Lake have been improved in recent years, this should improve access during low water.

Comment 38: “Increase disabled hunter opportunities as well by installing permanent accessible blinds for guys like myself that require walkers and wheelchairs”.

Response: Special youth hunting and access for hunters with disabilities will be encouraged and accommodated following Montana Fish, Wildlife, and Parks regulations and Refuge regulations. The refuge is interested in partnerships that might result in a permanent accessible blind but it is not yet a reality, given limited staff and higher refuge priorities.

Comment 39: “It’s tough to do much walking and any readily accessible hunting opportunities for me and other disabled hunters is a definite plus in my book”.

Response: If asked, we can accommodate disabled waterfowl or big game hunters. Please contact the Refuge Manager.

Comment 40: “As long as waterfowl and big game hunting opportunity can be expanded without detracting from waterfowl production, I favor such actions”.

Response: The expanded big game and waterfowl hunting should have minimal impacts on waterfowl production. Ducklings are most susceptible shortly after hatching in the spring. When waterfowl hunting opens, most waterfowl are capable of flying. Those that are still flightless, which consists mostly of late nesting waterfowl or large bodied birds, can swim away and hide from waterfowl hunting pressure. We expect minimal impact on waterfowl production with the expansion of waterfowl and big game hunting.

Comment 41: “Please do not allow out of state uninformed persons or groups to control our resources”.

Response: National Wildlife Refuges are owned by the American people. Out of state residents have as much right to express their opinion as local in-state residents. The Refuge, by law,

provides wildlife dependent recreation for Americans, including peoples from local, regional, and national scales.

Comment 42: “Will there be a reservation system that allows two hunters to call the refuge to “book a hunt date” or are you planning on “first come first to hunt?”.

Response: Applicants will participate in a drawing for dates during the first year. If this method is successful it will be used in subsequent years. If it is not successful an alternate method will be developed to select the two hunters/day. We do not plan to use a reservation system.

Comment 43: “Will a system be put in place to allocate days per hunter or will two hunters be allowed to be the first in line each consecutive day until all tags are filled?”

Response: The drawing will give each hunter selected a first, second, and third choice for dates. One of those choices can be for “any day” during the general big game hunting season.

Comment 44: “Red Rock Lakes is a NWR – it should not function as a hunting lodge or club. The existing land area available for hunting is more than sufficient. Perhaps hunters should be encouraged to set down their rifles and shotguns and pick up a pair of binoculars”.

Response: The 1997 Refuge Improvement Act establishes 6 priority wildlife dependent recreational uses. The Act also encourages refuge managers to open Refuges for these uses, if compatible with refuge purpose and mission. Hunting is one of these 6 activities.

Comment 45: The Fish and Wildlife Service draft HP/EA document is framed as a proposed decision on whether to allow expansion of hunting certain species and hunting anew for others; however the analysis and planning contained in the document is so inadequate as to call to question whether any hunting can be allowed on the refuge without a new and completed Wildlife and Hunt Management Plan and accompanying Environmental Impact Statement.

Much of the planning that guided the Fish and Wildlife Service draft HP/EA is in the larger document “Red Rock Lakes NWR Comprehensive Conservation Plan” (CCP) published June 2009. That document discussed expansion of hunting opportunities, analyzed impacts and cumulative impacts of various alternatives and discussed goals and objectives for various refuge programs, habitats and wildlife species. The Hunt Plan and associated Environmental Assessment was developed as a step down plan and analysis to the CCP. Comments to both the CCP and to this HP/EA have guided direction of the final Hunt Plan and final EA. Several modifications were based on the significant and thoughtful comments received. This is not deemed a major federal action and thus does not require the depth of analysis normally found in an Environmental Impact Statement.